### RF Bandwith Acquisition Corp. P.O. BOX 911487 Los Angeles, CA 90091 (323)888-2111

February 25, 2013

Marlene H. Dortch, Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Suite TW-A325 Washington, DC 20554

> Re: Certification of CPNI Filings EB Docket No. 06-36

Dear Ms. Dortch:

RF Bandwith Acquisition Corp. is filing herewith, in accord with the Commission's Public Notice (DA 13-61 Released January 16, 2013) and 47 C.F.R. Section 64.2009(e), files its Certification of Compliance and an accompanying statement for year ended December 31, 2012.

Thank you for your attention to this matter.

Very truly yours,

James J. Crawford

### Annual 47 C.F.R. § 64.2009(e) CPNI Certification

#### EB Docket 06-36

Annual 64,2009(e) CPNI Certification for 2013 covering the prior calendar year 2012

Date filed: February 25, 2013

Name of company(s) covered by this certification: RF Bandwith Acquisition Corp.

Form 499 Filer ID: N/A

Name of signatory: James J. Crawford

Title of signatory: Vice President

I, James J. Crawford, certify that I am an officer of RF Bandwith Acquisition Corp. and acting as an agent of RF Bandwith Acquisition Corp. that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq*.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47.CF.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

**Attachments:** 

Accompanying Statement explaining CPNI procedures Explanation of actions taken against data brokers

Summary of customer complaints

# Accompanying Statement to Annual CPNI Compliance Certification CPNI Procedures

In compliance with 47 C.F.R. § 64.2001 et seq, I, James J. Crawford, officer of RF Bandwith Acquisition Corp. certifies that the company has taken the following steps in compliance with the rules of the Federal Communications Commission which govern the protection of Customer Proprietary Network Information (CPNI).

The following operating procedures ensure that RF Bandwith Acquisition Corp. is in compliance with the FCC's CPNI Rules:

RF Bandwith Acquisition Corp. does not make available to any affiliated or unaffiliated entity information which meets the definition of CPNI set forth at 47 U.S.C. § 222(h)(1), except when required to do so by law.

RF Bandwith Acquisition Corp. only uses CPNI to render, and bill for, the telecommunications services it provides to its customers. RF Bandwith Acquisition Corp. does not use its customers' CPNI for any marketing purpose, either internal or external, or other purpose set forth in the FCC's CPNI Rules, 47 C.F. R. § 64.2001 et seq.

RF Bandwith Acquisition Corp. has practices and procedures that govern the disclosure of CPNI:

- RF Bandwith Acquisition Corp. does not disclose or release CPNI upon a customer's telephone request.
- RF Bandwith Acquisition Corp. does not disclose or release CPNI through online access over the Internet.
- With respect to telephone inquires by customers concerning specific callrelated issues, RF Bandwith Acquisition Corp. requires the customer to provide sufficient specific information about the call in question to confirm the customer's identity.
- RF Bandwith Acquisition Corp. automatically notifies customers (at the customer's original telephone number or address on file) in case any changes are made to the customer's primary account information.
- RF Bandwith Acquisition Corp. is prepared to notify the required U.S. government agencies in the event of a breach of the CPNI rules and to provide the required notice to affected customers of any such breach.

RF Bandwith Acquisition Corp. provides training to all relevant employees on the company's practices and procedures that protect CPNI and its misuse.

It is a violation of RF Bandwith Acquisitions policies to disclose CPNI outside of RF Bandwith Acquisition Corp. Any employee that is found to have violated this policy will be subject to disciplinary action up to and including termination.

Access to CPNI at RF Bandwith Acquisition Corp. is restricted to a limited number of employees and controlled through the use of active security and other measures, including the use of special passwords that are assigned on a limited basis and technological measures which prohibit the electronic reproduction or distribution of CPNI. Encryption and other security practices are utilized when CPNI is transmitted electronically.

Strict controls are in place involving responses to law enforcement agencies that serve RF Bandwith Acquisition Corp. with valid legal demands, such as a court ordered subpoena, for CPNI. RF Bandwith Acquisition Corp. will not supply CPNI to any law enforcement agency that does not produce valid legal demand.

## **Summary of Actions Taken Against Data Brokers**

In compliance with 47 C.F.R. § 64.2009(e), I, James J. Crawford, acting on behalf of RF Bandwith Acquisition Corp. summarize the actions that the Company has taken against Data Brokers within the last year:

No such actions taken against Data Brokers within the last year

## **Summary of Customer Complaints Received**

In compliance with 47 C.F.R. §64.2009 (e), I James J. Crawford, acting on behalf of RF Bandwith Acquisition Corp. provide a summary of customer complaints received within the last year:

- 1. The Company has received no complaints as a result of improper access by employees.
- 2. The Company has received no complaints as a result of improper disclosure to individuals not authorized to receive the information.
- 3. The Company has received no complaints as a result of instances of improper access to online information by individuals not authorized to view information.